

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	
)	Case No. 4:19-cv-00415
ALEXANDRU BITTNER,)	
Defendant.)	
_____)	

**UNITED STATES' UNOPPOSED MOTION TO EXTEND THE DEADLINE TO FILE A
REPLY TO DEFENDANT'S RESPONSE TO THE
UNITED STATES' MOTION FOR PARTIAL SUMMARY JUDGMENT**

The Plaintiff the United States of America moves the Court to extend the deadline for the United States to file a reply to Defendant's Response to the United States' Motion for Partial Summary Judgment (ECF # 47) and in support thereof, states as follows:

1. Pursuant to Local Rule CV-7(e) a party has 7 days to file a reply to a response to a motion for summary judgement. The United States' response is currently required to be filed on April 27, 2020.
2. Counsel for the United States is working from home and has limited access to all the files and documents in this case. Additionally, it requires additional time working remotely to scan, copy, organize, mark, and redact any documents necessary for the United States' Reply.
3. The United States requests to extend the deadline to file its reply until May 4, 2020.
4. The request is not made for delay but to allow for an adequate reply.
5. Plaintiff's counsel has conferred with Defendant's counsel, and Defendant does not oppose the extension requested.

Respectfully submitted,
RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

/s/ Herbert W. Linder
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ATTORNEYS FOR UNITED STATES

CERTIFICATE OF CONFERENCE

On April 22, 2020, I conferred with Rachael Rubenstein, counsel for Defendant Alexandru Bittner, regarding this motion and she stated that she was unopposed to the relief sought herein.

/s/ Herbert W. Linder
HERBERT W. LINDER

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the foregoing motion has been made on
April 23, 2020, by the Clerk's ECF filing system to:

CLARK HILL STRASBURGER
Farley P. Katz
Rachael Rubenstein
2301 Broadway St.
San Antonio, Texas 78209

/s/ Herbert W. Linder
HERBERT W. LINDER